

**THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

HEADWATER RESEARCH LLC,

Plaintiff,

v.

SAMSUNG ELECTRONIC CO., LTD and
SAMSUNG ELECTRONICS AMERICA, INC.,

Defendants.

Case No. 2:22-CV-00422-JRG-RSP

**DECLARATION OF THOMAS H. REGER II IN SUPPORT OF DEFENDANT
SAMSUNG'S MOTION TO STRIKE AMENDED EXPERT REPORTS OF
DR. ANDREAS GROEHN AND MR. DAVID KENNEDY**

I, Thomas H. Reger II, hereby declare:

1. I am a Principal with the law firm Fish & Richardson P.C., and counsel for Defendants Samsung Electronics Co., Ltd. and Samsung Electronics America, Inc. I have personal knowledge of the facts contained in the declaration and, if called upon to do so, I could and would testify competently to the matters herein.

2. Attached hereto as Exhibit 1 is a true and correct copy of Errata Statement by Dr. Andreas Groehn, dated April 22, 2024.

3. Attached hereto as Exhibit 2 is a true and correct copy of Report of Dr. Andreas Groehn, served March 29, 2024.

4. Attached hereto as Exhibit 3 is a true and correct copy of Expert Report of Mr. David Kennedy, served March 29, 2024.

5. Attached hereto as Exhibit 4 is a true and correct copy of excerpts from the Expert Report of Sarah Butler, served April 19, 2024.

6. Attached hereto as Exhibit 5 is a true and correct copy of excerpts from the Expert Report of Philip W. Kline, served April 19, 2024.

7. Attached hereto as Exhibit 6 is a true and correct copy of excerpts from the Rebuttal Expert Report of Keith R. Ugone, Ph.D., served April 19, 2024.

8. Attached hereto as Exhibit 7 is a true and correct copy of the April 22, 2024 email from counsel serving amended Groehn report.

9. Attached hereto as Exhibit 8 is a true and correct copy of the April 22, 2024 email from counsel serving corrected Kennedy report.

10. Attached hereto as Exhibit 9 is a true and correct copy of the redlined version of the Amended Report of Dr. Andreas Groehn, as provided by Headwater's counsel on April 22, 2024.

11. Attached hereto as Exhibit 10 is a true and correct copy of the Corrected Expert Report of Mr. David Kennedy, served April 22, 2024.

12. Attached hereto as Exhibit 11 is a true and correct copy of email correspondence between counsel, dated April 23, 2024.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 25th day of April, 2024, in Dallas, Texas.

/s/ Thomas H. Reger II
Thomas H. Reger II